REMARKS

This application has been carefully reviewed in light of the Office Action dated April 6, 2009. Claims 1 to 12, 14, 15 and 24 to 30 have been cancelled without prejudice or disclaimer of subject matter. Claims 13 and 16 to 23 are pending in the application, of which Claims 13, 22 and 23 are in independent form. Reconsideration and further examination are respectfully requested.

Claims 1, 4, 5, 10 to 12 and 24 to 26 have been rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 5,796,429 (Suzuki) in view of U.S. Patent No. 6,463,432 (Murakawa). Claims 3, 6 to 9 and 27 to 30 have been rejected under 35 U.S.C. § 103(a) over Suzuki in view of Murakawa and in view of Official Notice. Claims 13 to 15, 22 and 23 have been rejected under 35 U.S.C. § 103(a) over Suzuki in view of Murakawa and in view of U.S. Patent Application Publication No. 2005/0110878 (Dalton). Claims 16 to 21 have been rejected under 35 U.S.C. § 103(a) over Suzuki in view of Murakawa in view of Dalton and further in view of Official Notice. Reconsideration and withdrawal of these rejections are respectfully requested.

The claims herein generally concern controlling an imaging apparatus that records captured images. The imaging apparatus is connected to an image storage component in a removable condition. The image storage component stores a plurality of image data. Retrieve condition data, such as a key image or a keyword, is read from a retrieve condition storage component of the imaging apparatus, for use as a retrieve condition when performing image retrieval. A retrieval result is retrieved by searching for image data that matches or is similar to the retrieve condition data from among the plurality of image data stored in the image storage component. The retrieval result is stored in an

internal storage component of the imaging apparatus. Even in a case where the image storage component is detached from the imaging apparatus and is replaced with a different image storage component, a retrieval result is retrieved from among a plurality of image data stored in the different image storage component using the common retrieve condition data which has been used with respect to the image storage component. Retrieved retrieval results are accumulatively stored in the internal storage component until there is an explicit delete instruction.

Applicant submits that the applied references, alone or in any permissible combination, are not seen to disclose or to suggest the foregoing arrangement, particularly the notion of using common retrieve condition data stored in an imaging apparatus to search for retrieval results from a plurality of images stored in each of a plurality of image storage components that are sequentially connected to and detached from the imaging apparatus.

More particularly, the applied references, alone or in any permissible combination, are not seen to disclose or to suggest at least the features of retrieving a retrieval result by searching for image data that matches or is similar to retrieve condition data, stored in an imaging apparatus, from among a plurality of image data stored in an image storage component connected to the imaging apparatus, wherein even in a case where the image storage component is detached from the imaging apparatus and is replaced with a different image storage component, further retrieving a retrieval result from among a plurality of image data stored in the different image storage component using the common retrieve condition data which has been used with respect to the image storage component, and which is stored in the imaging apparatus, wherein retrieved retrieval results are

accumulatively stored in an internal storage component of the imaging apparatus until there is an explicit delete instruction.

Dalton is seen to disclose a digital camera that enables a user to designate a captured image as a favorite image. The user may designate an image as a favorite image by selecting an option displayed on the digital camera's display screen. Images that are designated as favorite images are stored in the digital camera's internal memory. Dalton also discloses that images that are stored in a memory card and then designated as favorite images by a user are transferred from the memory card to the internal memory.

On the other hand, the claims herein define control of an imaging apparatus that stores retrieve condition data, such as a key image or a keyword, for use as a retrieve condition when performing image retrieval. A retrieval result is retrieved by searching for image data that matches or is similar to the retrieve condition data from among a plurality of image data stored in an image storage component that is connected to the imaging apparatus in a removable condition. The retrieval result is stored in an internal storage component of the imaging apparatus. Even in a case where the image storage component is detached from the imaging apparatus and is replaced with a different image storage component, an additional retrieval result is retrieved from among a plurality of image data stored in the different image storage component using the common retrieve condition data which has been used with respect to the image storage component, and which is stored in the imaging apparatus. The retrieved retrieval results from the image storage component and the different image storage component are accumulatively stored in the internal storage component until there is an explicit delete instruction.

In contrast, Dalton is seen to disclose that images that are stored in a memory card and then designated as favorite images by a user are transferred from the memory card to an internal memory. However, Dalton is believed to be silent on using common retrieve condition data stored in an imaging apparatus to search for retrieval results from a plurality of images stored in each of a plurality of image storage components that are sequentially connected to and detached from the imaging apparatus.

Therefore, Dalton is not seen to disclose or to suggest at least the features of retrieving a retrieval result by searching for image data that matches or is similar to retrieve condition data, stored in an imaging apparatus, from among a plurality of image data stored in an image storage component connected to the imaging apparatus, wherein even in a case where the image storage component is detached from the imaging apparatus and is replaced with a different image storage component, further retrieving a retrieval result from among a plurality of image data stored in the different image storage component using the common retrieve condition data which has been used with respect to the image storage component, and which is stored in the imaging apparatus, wherein retrieved retrieval results are accumulatively stored in an internal storage component of the imaging apparatus until there is an explicit delete instruction.

Suzuki and Murakawa have been studied, but they are not seen to teach anything that, when combined with Dalton, would overcome the deficiencies of Dalton as described above.

Therefore, the applied references, alone or in any permissible combination, are not seen to disclose or to suggest at least the features of retrieving a retrieval result by searching for image data that matches or is similar to retrieve condition data, stored in an imaging apparatus, from among a plurality of image data stored in an image storage component connected to the imaging apparatus, wherein even in a case where the image storage component is detached from the imaging apparatus and is replaced with a different image storage component, further retrieving a retrieval result from among a plurality of image data stored in the different image storage component using the common retrieve condition data which has been used with respect to the image storage component, and which is stored in the imaging apparatus, wherein retrieved retrieval results are accumulatively stored in an internal storage component of the imaging apparatus until there is an explicit delete instruction.

In view of the foregoing amendments and remarks, independent Claims 13, 22 and 23, as well as the claims dependent therefrom, are believed to recite subject matter that would not have been obvious from the applied art, and are therefore believed to be in condition for allowance.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

CONCLUSION

No claim fees are believed due. However, should it be determined that

additional claim fees are required under 37 C.F.R. 1.16 or 1.17, the Director is hereby

authorized to charge such fees to Deposit Account 06-1205.

Applicant's undersigned attorney may be reached in our Costa Mesa,

California office at (714) 540-8700. All correspondence should continue to be directed to

our below-listed address.

Respectfully submitted,

/Shant Tchakerian #61,825/

Shant H. Tchakerian Attorney for Applicant

Registration No.: 61,825

FITZPATRICK, CELLA, HARPER & SCINTO

30 Rockefeller Plaza

New York, New York 10112-3800

Facsimile: (212) 218-2200

FCHS_WS 3564996v1

- 14 -